

Defendant's Exhibit 74

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843
CONSUMER USER PROFILE Case No.
LITIGATION 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

* * CONFIDENTIAL * *

ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)
CORPORATE REPRESENTATIVE - MICHAEL DUFFEY
(Reported Remotely via Video & Web Videoconference)
Palo Alto, California (Deponent's location)
Wednesday, June 2, 2022

STENOGRAPHICALLY REPORTED BY:

REBECCA L. ROMANO, RPR, CSR, CCR

California CSR No. 12546

Nevada CCR No. 827

Oregon CSR No. 20-0466

Washington CCR No. 3491

JOB NO. 5234611

PAGES 1 - 194

1 A. Thank you. 09:53:03

2 I met with counsel for Gibson Dunn

3 approximately for 38 hours over the course of four

4 weeks. I believe that there were ten sessions.

5 I reviewed the documents that were 09:53:22

6 produced to plaintiffs, I believe a week or so ago.

7 I reviewed correspondence from Gibson

8 Dunn to plaintiffs regarding legal hold and -- and

9 preservation of ESI.

10 I reviewed a handful of documents that 09:53:53

11 were provided from -- by plaintiffs to Gibson Dunn.

12 I reviewed the 30(b)(6) notice and the

13 correspondence that I mentioned from May 18th,

14 2020 -- 2022.

15 I spoke with various employees at the 09:54:25

16 company to help learn more about the various topics

17 at issue here.

18 Q. And is all of this information detailed

19 in the notes that you're reviewing?

20 A. The -- the timing of the events, the 09:54:56

21 number is on -- on the notes. The people that I

22 spoke with are -- are also listed.

23 Q. Do you have --

24 A. There's listing --

25 Q. I'm so sorry. Please continue. 09:55:15